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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
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13 JOHN EARL CAMPBELL,

14 Plaintiff,

15 v.

16 NATIONAL PASSENGER RAILROAD  
CORPORATION dba AMTRAK, JOE  
17 DEELY, and DOES 1-15, inclusive,

18 Defendants.  
19

) NO. C05-5434 MJJ (EDL)  
)  
)

) **PLAINTIFF'S REQUEST FOR JUDICIAL**  
) **NOTICE IN OPPOSITION TO**  
) **DEFENDANT NATIONAL RAILROAD**  
) **PASSENGER CORPORATION'S**  
) **REQUEST FOR LEAVE TO FILE**  
) **MOTION FOR RECONSIDERATION OF**  
) **ORDER RE: MOTIONS TO COMPEL**  
) **AND IN SUPPORT OF PLAINTIFF'S**  
) **REQUEST FOR IMPOSITION OF**  
) **SANCTIONS**  
20

DATE: June 15, 2007

21 HON. ELIZABETH D. LAPORTE  
22

TRIAL DATE: July 23, 2007  
23

24 **TO: DEFENDANTS AND THEIR ATTORNEYS OF RECORD:**

25 **PLEASE TAKE NOTICE** that Plaintiff JOHN EARL CAMPBELL will ask the  
26 Court to take judicial notice of the following documents pursuant to Federal Rule of Evidence, Rule  
27 201(d) in its consideration of Defendant's Request for Leave to File Motion for Reconsideration of  
28 Order re: Motions to Compel and in support of Plaintiff's Request for Imposition of Sanctions:

1. Declaration of Paul Ho In Support of Defendants National Railroad Passenger Corporation and Joe Deely's Motion for Summary Judgment Or In the Alternative, Summary Adjudication filed by defense counsel on April 3, 2007 at pp. 3:7-4:14, wherein he discusses in detail Mr. Campbell's 2001 application for an Engineer position in the San Jose Crew Base.

Dated: June 15, 2007

PRICE AND ASSOCIATES

/s/ Pamela Y. Price  
PAMELA Y. PRICE, Attorneys for Plaintiff  
JOHN EARL CAMPBELL